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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
12

13 In re

14 PG&E CORPORATION

15 and
16

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 * All papers shall be filed in the Lead Case
23 No. 19-30088 DM.

Case Nos. 19-30088 DM (Lead Case)
19-30089 DM

Chapter 11
Jointly Administered

Date: May 9, 2019
Time: 9:30 a.m.
Place: Courtroom 17
450 Golden Gate Avenue
San Francisco, California

OBJECTION DEADLINE: April 24, 2019

DKT # 1324

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25 **EX PARTE APPLICATION BY TURN TO MODIFY PAGE LIMIT FOR REPLY TO**
26 **OPPOSITIONS TO MOTION BY TURN FOR APPOINTMENT OF**
27 **OFFICIAL COMMITTEE OF RATEPAYER CLAIMANTS**
28 **PURSUANT TO 11 U.S.C. §§ 1102(a)(2), 105(a)**

1 The Utility Reform Network (“TURN”) hereby applies to this Court for an order modifying
2 the limitation of Bankruptcy Local Rule 9013-1, expanding the 15-page limit on reply memoranda to
3 21 pages. TURN respectfully represents as follows in this Ex Parte Application:

4 1. The Motion by TURN for Appointment of Official Committee of Ratepayer
5 Claimants Pursuant To 11 U.S.C. §§ 1102(a)(2), 105(a); Memorandum of Points & Authorities [Dkt.
6 #1324] (the “Motion”) was filed and served on April 10, 2019.

7 2. The U.S. Trustee, Debtors and Official Committee of Unsecured Creditors each filed
8 substantial oppositions to the Motion, raising issues that exceeded, to a degree, the scope of TURN’s
9 original filing. In crafting a response, TURN had to delve deep into aspects of regulatory law that,
10 in order to offer a full reply, required 21 pages of text. TURN could not, despite attempting to do so,
11 reduce the text to anything near the 15-page limit set in BLR 9013-1 for reply memoranda. TURN
12 believes that additional 6 pages of argument and legal authority to be essential for reaching an
13 appropriate and fully-considered result on the Motion.

14 WHEREFORE, the Debtor respectfully requests that the Court grant this Application and
15 enter an order modifying Bankruptcy Local Rule 9013-1 as to the Motion and expanding the 15-page
16 limit on reply memoranda to 21 pages for the Reply to Oppositions to Motion by Turn for
17 Appointment of Official Committee of Ratepayer Claimants Pursuant To 11 U.S.C. §§ 1102(a)(2),
18 105(a).

19 Dated: May 2, 2019

BINDER & MALTER, LLP

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21 By: /s/ Robert G. Harris
Robert G. Harris

22 Attorneys for TURN, the Utility Reform Network
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